

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA  
ERIE DIVISION

RANDY J. SPENCER,

Plaintiff

v.

MATT MCSPARREN, BOB BETZOLD,  
FRED BUCKHOLTZ, and REGINA  
DELOE, ERIC HEIL, and TOWNSHIP OF  
CRANBERRY

Defendants.

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: Docket No. 1:23-cv-00036-SPB  
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: *Electronically Filed*  
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: JURY TRIAL DEMANDED  
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**JOINT MOTION TO EXTEND CASE MANAGEMENT DEADLINES**

NOW COMES the Plaintiff, Randy J. Spencer and Defendants Matt McSparren, Bob Betzold, Fred Buckholz, Regina Deloe, Township of Cranberry, and Eric Heil and file this Joint Motion to Extend Case Management Deadlines, respectfully representing:

1. On June 12, 2024, this Honorable Court entered a text Order extending the deadline for the close of discovery until August 9.
2. Plaintiff and Defendant are requesting additional time to complete discovery as follows:
  - a. Fact discovery will close on October 9, 2024;
  - b. Plaintiff's responses to discovery are due by September 9, 2024; and
  - c. Plaintiff must appear for deposition by September 23, 2024, after responding to Defendants' discovery.
  - d. Defendants must be available for depositions before October 4, 2024.
  - e. All other deadlines are to be determined.

3. This case involves years of past litigation between the parties. Therefore, the extension is necessary to secure documents, identify witnesses, and to substantiate claims and defenses asserted by the parties.

4. Plaintiff and Defendants agree to this Motion.

5. The parties do not anticipate the need for an additional extension of time to complete fact discovery.

6. Neither party will be harmed if the requested extension is granted.

7. The parties have attached a proposed Order.

WHEREFORE, Plaintiff and Defendants respectfully request this Honorable Court grant the requested extension to complete discovery and extend the current discovery deadline as proposed herein and in the attached proposed order.

RESPECTFULLY SUBMITTED,

DATE: August 8, 2024

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